

U.S. DISTRICT COURT
N.D. OF N.Y.
FILED

JUN 01 2007

LAWRENCE K. BAERMAN, Clerk
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

----- X
SPERO HARITATOS,

Plaintiff,

05 Civ. 930 (DNH/GJD)

- against -

HASBRO, INC.
and TOYS "R" US-NY LLC,

Defendants.
----- X

PROPOSED ORDER TO FILE UNDER SEAL

Paragraph 9 of the Protective Order Governing Confidentiality entered by the Court on March 29, 2006 ("Protective Order") (Docket No. 46-47) affords the parties the right to designate discovery material "CONFIDENTIAL" and to file any papers containing "CONFIDENTIAL" designations under seal by placing the papers in a sealed envelope or other opaque container, covered by a caption page marked with the following statement: "FILED UNDER SEAL; CONFIDENTIAL -- SUBJECT TO PROTECTIVE ORDER."

Defendants Hasbro, Inc. and Toys "R" Us-NY LLC (hereinafter collectively "Defendants") have requested permission to file the following papers under seal pursuant to

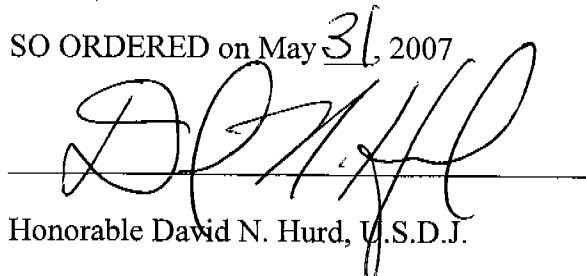
paragraph 9 of the Protective Order, which they represent to contain information designated as "CONFIDENTIAL" either by Defendants or Plaintiff Spero T. Haritatos: (1) Defendants' Brief In Support of Motion For Summary Judgment; (2) the Declaration of Kim J. Landsman and attached exhibits, dated May 29, 2007; (3) the Declaration of Jill Hambley and attached exhibits, dated May 29, 2007; (4) Declaration of Sean Wiggins and attached exhibit, dated May 29, 2007; and (5) Defendants' Statement of Material Facts Pursuant to Local Rule 7.1(a)(3).

Therefore, it is

ORDERED, that the following papers shall be filed under seal pursuant to the Protective Order entered in this case:

- (1) Defendants' Brief In Support of Motion For Summary Judgment;
- (2) Declaration of Kim J. Landsman and attached exhibits, dated May 29, 2007;
- (3) Declaration of Jill Hambley and attached exhibits, dated May 29, 2007;
- (4) Declaration of Sean Wiggins and attached exhibit, dated May 29, 2007; and
- (5) Defendants' Statement of Material Facts Pursuant to Local Rule 7.1(a)(3).

SO ORDERED on May 31, 2007


Honorable David N. Hurd, U.S.D.J.

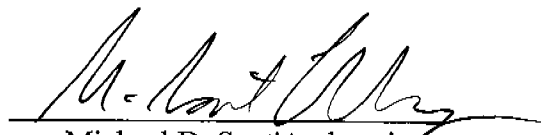
CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing the **PROPOSED ORDER TO FILE UNDER SEAL** to be filed with the Court, with copies sent electronically and by First Class Mail to the counsel set forth below on May 30, 2007:

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